IN THE UNITED STATES DISTRICT COURT FOR THE

EASTERN DISTRICT OF VIRGINIA Alexandria Division

| UNITED STATES OF AMERICA |) | |
|--------------------------|---|------------------------|
| |) | |
| v. |) | Criminal No. 1:04cr385 |
| |) | |
| ALI AL-TIMIMI |) | |

MOTION TO SEAL AND FILE A REDACTED EXHIBIT

On August 14, 2013, the government filed a response in opposition to the defendant's motion to compel discovery regarding Ajmal Khan. In connection with its response, the government filed four exhibits. One exhibit, Document 308-2, consisted of a report of interview, and contained personal identifying information that should have been redacted before being filed publicly.

The government now moves to seal Document 308-2, and replace it on the public docket with a redacted copy of that exhibit. The redacted copy of Exhibit 2 is attached to this motion.

Counsel for the defendant has authorized undersigned counsel to say that he does not oppose this motion.

A proposed order to seal is attached to this motion.

Respectfully submitted,

Neil H. MacBride United States Attorney

By: $/_{\rm S}/$ Gordon D. Kromberg Assistant United States Attorney Virginia Bar No. 33676 **Assistant United States Attorney** Attorney for the United States 2100 Jamieson Avenue Alexandria, VA 22314 (703) 299-3700 (703) 837.8242 (fax) gordon.kromberg@usdoj.gov

CERTIFICATE OF SERVICE

I hereby certify that on August 15, 2013, I electronically filed the foregoing GOVERNMENT'S MOTION TO SEAL AND FILE A REDACTED EXHIBIT and ORDER TO SEAL with the Clerk of Court using the CM/ECF system, which will send a notification of such filing (NEF) to the following:

> Manu Krishnan Bryan Cave LLP 1155 F Street, N.W., Suite 700 Washington, D.C. 20004 manu.krishnan@bryancave.com

> > $/_{\rm S}/$

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